University of Maryland Extension Data Collection Policy

Purpose
The purpose of this policy is to provide guidance to faculty and staff in University of Maryland Extension and Maryland Agricultural Experiment Station on the requirements to collect demographic data (race, ethnicity and sex) on recipients of federal funds. The main purpose of collecting this data is to demonstrate and document non-discrimination. Recipients include principal investigators on grants and graduate students; faculty and staff and volunteers delivering programs in Extension; and, direct program contacts (usually members of the public) in Extension programs. Demographic data must also be collected and maintained for committees and advisory bodies who influence and steer the direction of Research (MAES) projects and Extension (UME) programs.

Legal Basis
The requirement to collect demographic data, particularly race, ethnicity and sex of Extension program participants, is a condition of grant funding by U.S.D.A and its research agency, the National Institute of Food and Agriculture (NIFA). This requirement is expressed in 7 Code of Federal Regulation (C.F.R.) which effectuates Title VI of the 1964 Civil Rights Act. The same holds true for other recipients of grants and funding such as graduate students and faculty principal investigators (MAES and AGNR academic departments).

"...In general, recipients should have available racial and ethnic data showing the extent to which members of minority groups are beneficiaries of federally assisted programs."
— 7 C.F.R. Part 15A section 5(b)

"...no person shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic, extracurricular, research, occupational training, or other educational program or activity operated by a recipient..."— 7 C.F.R. Subpart D, section 15a 31.

There is no provision citing that data be provided to compliance reviewers in any specific format: recipients of federal funds or in-kind resources and their sub- recipients must adhere to data collection provisions of 7 C.F.R. on program contacts. The race, ethnicity and sex of people delivering Extension programs (such as faculty, staff and volunteers) and planning/advisory bodies must also be collected.

Data is not required for people with disabilities and limited English proficient program participants; however, maintaining records on accommodations and program contacts in these two areas may be advantageous. UMERS provides for entry of this information.

Data Collection Methods
The main vehicle for data collection in UME is the University of Maryland Extension Reporting System (UMERS). This data system enables faculty and staff to enter program contact data and to generate live reports at any time or level (state, cluster or county).*
4-H and some of the assisted and conducted nutrition programs have their own grant-based data collection and reporting vehicles: reports from these applications may be used when they have sufficient demographic data to fulfill 7 C.F.R. requirements. Ideally, all program contacts will be reflected in UMERS reporting wherever feasible to avoid an understatement of program data by Plan of Work subject matter areas.

Other sources of data for faculty, staff, and graduate student demographics may include, but are not limited to, data collected and accrued by campus institutional databases. Employment data showing the relative diversity of groups like faculty and admissions data showing the same for graduate students is generally available through institutional statistics.

**Login and Attendance Forms**

Two important aspects of data collection on program participants are how we tell participants we need demographic data; and, ensuring privacy—separating personally identifiable information such as names from demographic data like race, ethnicity, and sex. It is helpful to keep data reporting parallel with the current U.S. Census race and ethnicity categories so that actual program participation may be compared directly to the "potential beneficiary pool" or "who's out there" in the census population: this enables calculation of parity, or the percentage of actual participants in any demographic category to the percentage in the local (usually county) census population.

How people are asked to self-identify is crucial to collecting credible data. The most direct way is to share the idea that funding for programs depends in part of meeting the needs of all of the public, not just select groups. This "stand up and be counted" approach was used with some success by the U.S. Census in 2010, encouraging Hispanics to self-identify both ethnicity and race when responding to the census so that needed revenue could flow to their communities. While one reason data is collected is to evaluate the reach and appeal of programs to a wide variety of people, data may be used to demonstrate inclusion by attracting a broad base of the public, or to indicate the success of targeted programs meant to attract a particular segment like women or racial minorities. For AES-related events that attract the general public, Extension expertise in public notification and required data collection can be used.

Having program participants respond anonymously to paper, electronic or computer-based queries about their race, ethnicity, and gender is the easiest way to allow people to self-report. Collection of names, addresses, or e-mail addresses would be done on a separate piece of paper or unrelated screen. Separating the two events in time by asking program participants to report personally identifiable information (name, address, e-mail) at the end of the session and demographic information nearer the beginning, enhances the feeling of privacy and peoples' tendency to report. See UMERS manual for information on reporting 100% of participants.

**What to Do When Self-identification Is not Practical**

If there's a small number of participants, especially if they have come to other programs, the instructor (or volunteer) may want to do a close estimate of the people in the session and tally the race, ethnicity and sexes of the group. If, for example, a volunteer or Educator/Agent is conducting one-on-one face-to-face instruction in a situation such as a Plant Clinic, a tally like
this may work well, especially if it seems too time-consuming to have each person fill out a mini-survey. This kind of reporting may also be a practical approach when there is an extremely large group: do the best estimate possible of the room and assign numbers in race, ethnicity, and sex categories by "looking at the room."

<table>
<thead>
<tr>
<th></th>
<th>White</th>
<th>African-American or Black</th>
<th>American Indian or Alaska Native</th>
<th>Asian</th>
<th>Native Hawaiian/Other Pacific Islander</th>
<th>Two or More Races</th>
<th>Total Races</th>
<th>Hispanic</th>
<th>Female</th>
<th>Male</th>
<th>Total Sexes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1,080</td>
<td>876</td>
<td>7</td>
<td>541</td>
<td>2</td>
<td>213</td>
<td>2,719</td>
<td>326</td>
<td>1,441</td>
<td>1,278</td>
<td>2,719</td>
</tr>
<tr>
<td>Percent</td>
<td>39.72%</td>
<td>32.2%</td>
<td>0.35%</td>
<td>19.90%</td>
<td>0.00%</td>
<td>7.83%</td>
<td>100.0%</td>
<td>11.99%</td>
<td>53.00%</td>
<td>47.00%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

**Figure 1: Race, Ethnicity and Sex Categories**

*Note: Hispanic ethnicity percentage is a notation only: Hispanics are already included in race and sex totals. Race and ethnicity column headings derived from the Office of Management and Budget's categories. Only U.S. Census Bureau should use "Other."

For example, you are doing an enrichment topic in a nearby public school; schools may supply this data (without names) based on their enrollment demographics. Educational institutions are required to collect the same data as Extension under 34 Code of Federal Regulation.

**Bulk Reporting**

Data collection of race, ethnicity, and sex without any personally identifiable information attached is called "bulk" reporting. Bulk data is constrained to total numbers of participants by race, ethnicity (Hispanic), and sex.

Some programs such as 4-H and FSNE use enrollment to capture participant data. Enrollment data contains the name of each participant: for purposes of demographic reporting, names are removed and data is accrued in a bulk format to ensure individual privacy.

**Direct and Indirect Program Contacts**

Direct program contacts/participants are those who receive "face-to-face instruction" from faculty, staff and volunteers working in Extension programs. Whenever it is possible to observe and collect the race, ethnicity and sex of program participants, either by manual or electronic/computer-based methods, the program is considered a "direct teaching event."

Even a remote web-based session may have a monitor collecting this data at each location that is tuned in, thus enabling direct contacts to be collected. Alternately, participants may fill out a web-based inquiry to self-identify race, ethnicity, and sex at the beginning of the session.
When it is not possible to observe and collect the race, ethnicity, and sex of program participants, they are considered "indirect." Examples of indirect contacts include phone callers or email questioners, persons who pick up a brochure at a large field day or fair, any participant who cannot be observed or enabled to self-identify using any means.

**Volunteer and Advisory Group Data Collection**

Tracking the race, ethnicity and sex composition of advisory and stakeholder groups who influence program content and direction; and, tracking the composition of volunteers who may be helping deliver or make programs possible are two other data requirements of 7 C.F.R.

Advisory group data may be maintained separately in files, while volunteer data may be maintained as part of regular program reporting (as 4-H does).

The reason for scrutiny of volunteers and advisory groups is to 1) avoid exclusion of historically discriminated-against individuals and groups whose input would be valuable for program planning; and 2) unintended discrimination in programs by utilizing a program delivery staff who are not diverse and inclusive.

"Where a primary objective of the federal financial assistance is not to provide employment, but discrimination on the grounds of race, color, or national origin in the employment practices of the recipient...tends to exclude individuals from participation in, deny them the benefits of, or subject them to discrimination under any program or activity of the recipient...." — 7 C.F.R. Subtitle A, Section 15.3 (c)

Note that a "recipient" (of federal funds) is defined as UME, MAES, or similar recipient of federal funding for assisted programs through grants and/or other means.

**Staff and Volunteer Training**

Faculty responsible for each program area are ultimately responsible for data collection on program contacts. This includes Master Gardeners and other volunteer-led programs. This policy provides guidance that may be included in training materials and volunteer agreements to ensure that all the program contacts of Educators/Agents in each program area are captured and a complete and credible picture of inclusion and compliance can be drawn by examining data in UMERS.

* 7 C.F.R. requires that nondiscrimination data be based on collection at the county level by Educator/Agent for Extension programs.

**Accountability**

While faculty and staff delivering programs are responsible for collecting demographic data on program participants and entering it into the UMERS Reporting System in a timely and accurate manner, others in the organizational structure are responsible for supporting this effort.

The ultimate legal signatories on matters relating to federal compliance are: the Dean and Director of the Colleges (UMCP and UMES), and the unit heads (Deans and Assistant Deans) of Extension and Research (AES). Administrative leaders in charge of budgets, grants administration, evaluation and assessment, and related areas provide ongoing management.
and support to ensure the credibility of data. Equity officers, unit heads in charge of Human Resources and those tasked with compliance, diversity and inclusion, and training functions for the college, ensure faculty and staff receive training and support in the areas of compliance and inclusion. Other functions such as formulating formal plans and accompanying policy provide further support for ensuring compliance and inclusion activities are coherent and current with law and regulation.

For related details see UMERS Training Manual and the UME Internal Compliance Review Guide.